

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
EL DORADO DIVISION**

DELOIS PIPPEN, as Special Administratrix
of the Estate of Lucille G. Billings, deceased,
and on behalf of the wrongful death beneficiaries
of Lucille G. Billings; and On Behalf of All Others
Similarly Situated

PLAINTIFFS

vs.

Case No. 1:16-cv-01069-SOH

PINEWOOD HEALTH AND REHABILITATION, LLC;
ARKANSAS SNF OPERATIONS ACQUISITION, LLC;
ARKANSAS NURSING HOME ACQUISITION, LLC;
CSCV HOLDINGS, LLC; CAPITAL FUNDING GROUP, INC.;
SLC PROFESSIONALS, LLC; SLC PROFESSIONALS AR7, LLC;
SLC PROFESSIONALS HOLDINGS, LLC; SLC OPERATIONS
HOLDINGS, LLC; SLC OPERATIONS, LLC; SLC
ADMINISTRATIVE SERVICES OF ARKANSAS, LLC;
SENIOR LIVING COMMUNITIES OF ARKANSAS, LLC;
ADDIT, LLC; SLC OPERATIONS MASTER TENANT, LLC;
SLC PROPERTIES, LLC; 1101 WATERWELL ROAD, LLC;
CSCV ARKANSAS REALTY, LLC; ALAN ZUCCARI;
BRIAN REYNOLDS; JOHN W. DWYER; DANIEL BAIRD;
TROY MORRIS, in his capacity as Administrator of Pinewood
Health and Rehabilitation, LLC; EMILY GREENE, in her
capacity as Administrator of Pinewood Health and Rehabilitation, LLC;
CAROL HOELSCHER, in her capacity as Administrator of Pinewood
Health and Rehabilitation, LLC; and BARNEY L. PIERCE, in his
capacity as Administrator of Pinewood Health and Rehabilitation, LLC

DEFENDANTS

JOINT MOTION FOR DISMISSAL WITH PREJUDICE

The parties, Plaintiff, Delois Pippen, as Special Administratrix of the Estate of Lucille G. Billings, deceased, and on behalf of the wrongful death beneficiaries of Lucille G. Billings, deceased, and Defendants, for their Joint Motion for Dismissal with Prejudice, state:

1. Plaintiff originally filed this action against Defendants on February 3, 2016 in the Circuit Court of Ashley County, Arkansas. Defendants timely removed this matter to the United

States District Court, Western District of Arkansas, and filed Answers denying liability for the claims asserted by Plaintiff.

2. The parties have now reached an amicable resolution of this matter and there are no issues of law or fact remaining for resolution by the Court.

3. The parties move for dismissal of the Plaintiff's Complaint with prejudice.

WHEREFORE, the parties request that the Court grant their Joint Motion to Dismiss with Prejudice, that the Court enter an Order dismissing all claims with prejudice, and for any other relief to which they are entitled.

Respectfully submitted,

KUTAK ROCK LLP

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to the following:

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